UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

THOR 942 FULTON STREET, LLC,

Plaintiff,

v.

FUTURE TRANSACTIONS HOLDINGS, LLC, MM ENTERPRISES USA, LLC, and MEDMEN ENTERPRISES INC.,

Defendants.

Case No.: 1:22-CV-5880(JPO)

NOTICE OF MOTION TO DISMISS COMPLAINT

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Geoffrey Whitehouse, executed on September 16, 2022, the memorandum of law, dated September 16, 2022, and all other prior proceedings held herein, Defendants Future Transactions Holdings, LLC, MM Enterprises USA, LLC. and MedMen Enterprises, Inc. ("Defendants") by their attorneys, Guzov LLC, will move this Court at the Thurgood Marshall United States Courthouse, located at 40 Foley Square, New York, NY 10007, before the Honorable J. Paul Oetken, on November 4, 2022 or as soon as counsel can be heard, for an Order pursuant to Fed. R. Civ. P. 12(b)(6) dismissing the Complaint of Plaintiff Thor 942 Fulton Street, LLC on the ground that the Complaint fails to state a claim upon which relief can be granted, together with such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to Rule 6.1(b) of the Local Rules for the Southern District of New York, answering papers, if any, shall be filed and served on or before September 30, 2022 and reply papers, if any, shall be filed and served on or before November 4, 2022.

Dated: September 16, 2022

GUZOV, LLC

Debra J. Guzov Philip M. Smith Silvia Bolatti

437 Madison Avenue, 24th Floor New York, New York 10022 Tel.: (212) 371-8008

dguzov@guzovllc.co, psmith@guzovllc.com.

Attorneys for Defendants Future Transactions Holdings, LLC, MM Enterprises USA, LLC. and MedMen Enterprises, Inc.